

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

<b>IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	<b>HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)</b>

**CERTIFICATION OF ALEXIA R. BRANCATO IN SUPPORT OF OPPOSITION TO  
PLAINTIFFS' MOTION TO EXCLUDE TESTIMONY OF MARK ROBBINS, PH.D.**

**Alexia R. Brancato** hereby certify as follows:

1. I am a Partner at Kirkland & Ellis LLP, and counsel of record in the above-captioned litigation representing Defendants Torrent Pharmaceuticals Ltd. and Torrent Pharma Inc. I am fully familiar with the facts and circumstances of these actions. I make this Certification in support of Torrent's Opposition to Plaintiffs' Motion to Exclude the Testimony of Mark Robbins, Ph.D.

2. Attached hereto as **Exhibit 1** is a true and accurate copy of Mr. Quick's Expert Declaration.

3. Attached hereto as **Exhibit 2** is a true and accurate copy of Dr. Robbins' Expert Report.

4. Attached hereto as **Exhibit 3** is a true and accurate copy of Dr. Robbins' Deposition Testimony taken March 8, 2022.

5. Attached hereto as **Exhibit 4** is a true and accurate copy of Dawn Chitty's Deposition Testimony taken May 13, 2021.

6. Attached hereto as **Exhibit 5** is a true and accurate copy of of TORRENT-MDL2875-00504801, previously marked as Torrent 91 during Dawn Chitty's deposition.

7. Attached hereto as **Exhibit 6** is a true and accurate copy of the December 22, 2020 Letter from A. Brancato re: Torrent 30(b)(6) Designations.

8. Attached hereto as **Exhibit 7** is a true and accurate copy of the FDA Inspection Dashboard.

9. Attached hereto as **Exhibit 8** is a true and accurate copy of the Warning Letter Issued to Torrent Pharmaceuticals Ltd. on October 8, 2019.

10. Attached hereto as **Exhibit 9** is a true and accurate copy of the invoice received from Analysis Group, previously marked as Robbins 08 during Dr. Robbins's deposition.

Dated: June 2, 2022

Respectfully submitted:

/s/ Alexia R. Brancato

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